

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANNA DOBROWOLSKI, On Behalf of Herself)
and All Others Similarly Situated,) Hon. Edmond E. Chang
)
Plaintiff,)
)
v.) No. 17-cv-1446
)
INSTANT CHECKMATE, INC.)
)
Defendant.)

**JOINT MOTION FOR EXTENSION OF TIME
AND TO RESET INITIAL STATUS CONFERENCE**

Defendant Instant Checkmate, Inc., with agreement of Plaintiff Anna Dobrowolski, hereby respectfully moves this Court to extend the time for Defendant to answer or otherwise respond to the Complaint by forty-five (45) days, to April 17, 2017; and the parties jointly request that the recently set status conference for March 9, 2017 be reset as noted below. In support of this Motion, Defendant states as follows:

1. Defendant removed this action on February 24, 2017, and its answer or responsive pleading is currently due Friday, March 3, 2017.
2. This is a putative class action that is similar to several others that have recently been filed against Defendant's competitors and removed to this District within the past week, including another action filed by this Plaintiff.¹ The complaint and likely defenses present complex legal and factual issues, including threshold issues of possible first impression under the U.S. Constitution's First Amendment and the Illinois Right of Publicity Act.

¹See, e.g., *Dobrowolski v. Intelius, Inc.*, No. 17-cv-0429 (Jan. 19, 2017) (Shah, J.) (voluntarily dismissed, refiled in state court, and removed as *Dobrowolski v. Intelius, Inc.*, No. 17-cv-1406 (Feb. 23, 2017) (Ellis, J.)); *Vinci v. Spokeo*, No. 17-cv-1519 (Feb. 27, 2017) (Guzman, J.); *Vinci v. Beenverified, Inc.*, No. 17-cv-1447 (Feb. 24, 2017) (Aspen, J.).

3. The undersigned counsel has recently been retained to serve as local counsel for Defendant in this action, together with counsel Damon W.D. Wright of Venable LLP in Washington, D.C., and seeks an extension of time in order to complete Defendant's initial investigation and prepare its response to the Complaint, which Defendant anticipates will be a Motion to Dismiss.

4. Counsel for Defendant has spoken with counsel for Plaintiff, and Plaintiff consents to the requested extension of time to answer or otherwise respond, to April 17, 2017.

5. In addition, this Court has scheduled an initial status conference for March 9, 2017, and ordered the parties to produce a joint status report by March 6. For efficiency and in light of the requested extension on Defendant's responsive pleading, the parties jointly request that the status hearing and accompanying joint report be reset for a date closer in time to Defendant's extended filing deadline.

6. The requested extensions are sought in good faith and not for any improper purpose.

WHEREFORE, for the foregoing reasons, Defendant requests that the Court enter an Order granting Defendant an extension of time by forty-five days, to and including April 17, 2017, to answer or otherwise plead to the Complaint, and to strike and reschedule the initial status conference of March 9, 2017 to a new date closer in proximity to the extended filing deadline, as the Court sees fit.

Dated: March 2, 2017

Respectfully submitted:

By: /s/ Natalie J. Spears

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*One of the attorneys for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME AND TO RESET INITIAL STATUS CONFERENCE** was served via the Court's electronic filing system on this 2nd day of March, 2017, to the following:

ALL COUNSEL OF RECORD

/s/ Natalie J. Spears
One of the attorneys for Defendant